

Trisha Tshudy,	:
	:
<i>Plaintiff</i>	:
	:
vs.	: Civil Action No. 4:22-cv-01431-
	: MWB
	:
Pennsylvania State University	:
	:
<i>Defendant</i>	:
	:
	:

Defendant The Pennsylvania State University (“PSU”), by and through its undersigned attorneys, respectfully submits this Motion for Leave to file a Memorandum in excess of fifteen (15) pages and 5,000 words, pursuant to L.R. 7.8, and in support hereof avers as follows:

1. Plaintiff, Trisha Tshudy, filed a Complaint on August 21, 2022.
2. On September 13, 2022, PSU filed a Motion to Dismiss the Complaint.
3. On November 18, 2022, this Court granted PSU's Motion and dismissed all claims, but granted leave to amend with respect to Plaintiff's Americans with Disabilities Act claim.
4. PSU intends to file a Motion to Dismiss the Amended Complaint that Plaintiff filed on November 28, 2022.

5. Counsel for PSU is currently finalizing a Memorandum of Law in Support of PSU's Motion to Dismiss Amended Complaint.

6. Plaintiff's Amended Complaint is nine (9) pages with forty-four (44) paragraphs and five (5) exhibits. It has one count with one cause of action but this sole cause of action appears to include numerous causes of action for discrimination, retaliation, and failure to accommodate under at least two statutes and on multiple different alleged factual bases. The Complaint also contains references to dismissed claims, *i.e.*, deprivation of due process and First Amendment claims.

7. Due to the large number of allegations and various, potential causes of action that must be addressed in the forthcoming Motion to Dismiss Amended Complaint, PSU's Memorandum will be in excess of fifteen (15) pages and/or 5,000 words.

8. While PSU is working to keep the Memorandum as concise as possible, PSU respectfully request leave to file a Memorandum that does not exceed forty (40) pages and/or 8,500 words.

9. Granting this Motion will not delay this matter.

10. This Motion has been filed more than two (2) business days before the date on which said Motion Dismiss is due.

11. All Parties consent in this Motion.

WHEREFORE, Defendant, The Pennsylvania State University, respectfully

requests that the Court grant this Motion for Leave to File a Memorandum in Support of its Motion to Dismiss Amended Complaint that does not exceed forty (40) pages and/or 8,500 words in length.

Dated: December 8, 2022

**BUCHANAN INGERSOLL &
ROONEY PC**

By: /s/ Geoffrey F. Sasso
Geoffrey F. Sasso (Pa. ID 202936)
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Pennsylvania State University*

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I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File a Memorandum in Excess of Fifteen Pages to be served via ECF Notice of Electronic Filing upon all counsel of record.

Dated: December 8, 2022